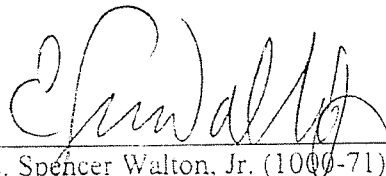


**SUBPOENA TO PRODUCE DOCUMENTS INFORMATION OR OBJECTS  
PROPOUNDED TO ALADEAN DEROSE AS ACTING CITY ATTORNEY  
CITY OF SOUTH BEND**

The South Bend Common Council, by counsel and pursuant to IC 36-4-6-21(b)(2), requests that the South Bend City Administration produce the following documents and things which are in the possession, custody and control of the South Bend City Administration, their attorney or other representative, within seven (7) days of service hereof. Said production is requested at the offices of the South Bend Common Council's counsel, E. Spencer Walton, Jr., of May Oberfell Lorber, 4100 Edison Lakes Parkway, Suite 100, Mishawaka, Indiana 46545.

Copies of any and all tapes and/or digital recordings related to the Mayor's news release of March 29<sup>th</sup> & March 30, 2012 regarding the demotion of former Police Chief Darryl Boykins; as well as the tapes and/or digital recordings cited by the Mayor in the termination of Communications Director Karen DePaepe.

Dated this 14<sup>th</sup> day of August, 2012



E. Spencer Walton, Jr. (1000-71)  
Attorney for South Bend Common Council

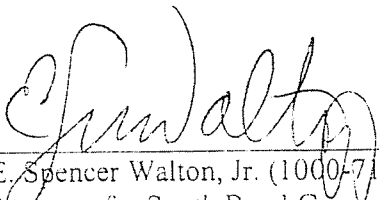
**MAY • OBERFELL • LORBER**  
4100 Edison Lakes Parkway, Suite 100  
Mishawaka, IN 46545  
Telephone: (574) 243-4100  
Facsimile: (574) 232-9789

CERTIFICATE OF SERVICE

I certify that service of the above document was made on August 14<sup>th</sup>, 2012 by hand-delivering a copy or copies upon the following:

Aladean DeRose, Interim City Attorney for the City of South Bend  
County City Building  
South Bend, IN

Mayor Pete Buttigieg  
Office of the Mayor  
227 West Jefferson Blvd., Suite 1400 N  
South Bend, Indiana 46601

A handwritten signature in black ink, appearing to read "E. Spencer Walton, Jr.", is written over a horizontal line.

E. Spencer Walton, Jr. (1000-71)  
Attorney for South Bend Common Counsel